



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

C. Howard

NOV 15 2007

Ms. Mary Lou Capichioni  
Director  
Remediation Services  
Corporate Environmental Services  
The Sherwin-Williams Company  
101 Prospect Avenue, N.W.  
Cleveland, OH 44115-1075

Re: *Response to USEPA Comments (October 31, 2007)*  
*Evaluation of Strategic Sampling Results - Bridgewood Lake and the Rail Road Site*  
*(August 9, 2006) AOC Index Number: No. II CERCLA-02-99-2035*  
*Gibbsboro Borough, Voorhees Township and Lindenwold Borough, New Jersey*

Dear Ms. Capichioni:

The U.S. Environmental Protection Agency (EPA) has completed its review of the *Response to USEPA Comments* (response letter), dated October 31, 2007, of the August 9, 2006 *Evaluation of Strategic Sampling Results - Bridgewood Lake and the Rail Road Site* submitted by the Sherwin-Williams Company (SWC) pursuant to Administrative Order Index No. II CERCLA-02-99-2035 and offers the following comments. In addition, the New Jersey Department of Environmental Protection Agency (NJDEP) has provided comments on the October 31, 2007 response letter as well, these comments are enclosed.

**SWC Response to USEPA Bridgewood Lake Sediment Comment #1, page 3**

1. Throughout the response letter the terms "fine-grained material" and "soft organic-rich sediment" are used interchangeably. Please use only one term, preferably the term "soft organic-rich sediment".
2. Please note, the sediment samples collected at locations BWDD0032 and BWDD0058, which are selected by the SWC to depict the (proposed) relationship between sediment composition (i.e., percent solids and total organic carbon (TOC)) versus the degree to which the presence/absence of contamination exists, appear to have been collected at the location of a former "bridge" and may be fill. As stated by the SWC and agreed to by EPA, the additional sampling operations (to be performed) throughout Bridgewood Lake will provide the additional information in order to make this determination.

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**SWC Response to USEPA Bridgewood Lake Sediment Comment #2, page 6**

Based on EPA's July 11, 2007 recommendation for the additional vertical delineation of surface sediment samples and the SWC's October 31, 2007 proposal for the collection of both surface and deeper sediment samples; EPA is making the following recommendations for additional vertical delineation, based on Bridgewood Lake Transect designations.

- BWL - 1** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0002 only.
- BWL - 4** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0007 and BWDD0011, but also requests that BWDD0004 and BWDD0014 be further delineated. Also, the newly proposed sediment sample (proposed beyond BWDD0014) is approved as well.
- BWL - 7** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0017 and BWDD0023, but also requests that BWDD0015 be further delineated.
- BWL - 10** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0028, but also requests that BWDD0030 be further delineated.
- BWL - 13** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0031, but also requests that BWDD0033 be further delineated.
- BWL - 14** EPA requests that all three samples: BWDD0034 - 36 be further delineated along this transect.
- BWL - 16** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0037 and BWDD0039.
- BWL - 19** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0042, however, EPA requests that sample locations BWDD0044 and BWDD0046 be further delineated, but not sample location BWDD0045.
- BWL - 20** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0047, but also requests that samples BWDD0048 and BWDD0051 be further delineated.
- BWL - 21** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0053, but also requests that sample BWDD0052 be further delineated.

EPA concurs with the sample collection procedures, which includes the use of the X-Ray Fluorescence (XRF) screening procedures. In addition, EPA does not require that the additional transects, specified in the approved 2003 Work Plan, be sampled, however, EPA requests that

SWC conduct field operations (similar to those "sediment profiling activities" performed by SWC at Bridgewood Lake in 2005) to determine the depth to coarse-grained material in areas of the lake (preferably along transects) not yet "profiled".

**SWC Response to USEPA Bridgewood Lake Soil Comment #5, page 13**

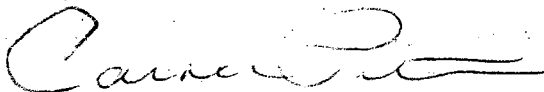
Soil samples to be collected for further delineating contamination at soil sample location BWSB0001 should be analyzed for TAL Metals and not just arsenic.

**SWC Response to NJDEP Additional Comment, page 19**

Please remove the last paragraph on the bottom of page 19. The topic of additional Bridgewood Lake sampling is discussed in EPA's comment, "SWC Response to USEPA Bridgewood Lake Sediment Comment #2 page 6" above.

EPA is requesting that the SWC submit a revised response letter within 21 days of receipt of EPA's comments. If you have any questions on this matter, you may contact Mr. Ray Klimcsak, at (212) 637-3916, or if you have any legal concerns, Mr. Carl Howard, Esq., at (212) 637-3216.

Sincerely yours,



Carole Petersen, Chief  
New Jersey Remediation Branch

Enclosures

cc: Sally Jones, Weston w/encls.  
Hank Martin, ELM w/encls.  
John Doyon, NJDEP w/encls.



Jon S. Corzine  
Governor

**State of New Jersey**  
Department of Environmental Protection

Lisa P. Jackson  
Commissioner

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Raymond Klimcsak  
Superfund Branch  
USEPA Region II  
290 Broadway - 19th Flr  
New York, NY 10007-1866

November 14, 2007

**Remedial Investigation Report/Work Plan Approval**

Re: Sherwin Williams Company Paint Works  
Gibbsboro Boro; Voorhees Township; Lindenwold Borough  
Response to USEPA Comments: Evaluation of Strategic Sampling Results-  
Bridgewood Lake and the Rail Road Site (August 9, 2006)  
SRP PI# G000004382  
EA ID #: SUB070011

Dear Mr. Klimcsak:

The New Jersey Department of Environmental Protection (Department) has completed review of the Response to Comments regarding the document: Evaluation of Strategic Sampling Results-Bridgewood Lake and the Rail Road Site (August 9, 2006) dated October 31, 2007. The Department has determined that the Responses to the Department's comments are acceptable and the Evaluation of Strategic Sampling Results-Bridgewood Lake and the Rail Road Site, with the October 31, 2007 revisions, is in compliance with the Technical Requirements for Site Remediation, N.J.A.C. 7:26E and other applicable requirements. The Department hereby approves the Remedial Investigation Report, effective the date of this letter.

Please have Sherwin-Williams provide a schedule indicating the expected date for the submission of a Remedial Investigation Report for the work to be conducted based on the proposals in the approved documents.

Please note that in response to NJDEP's Comment 4, Sherwin-Williams included the citations for the "Action Levels". This is acceptable to the Department. However, the Department requests that EPA require these action levels to be provided with each deliverable from Sherwin Williams.

Thank you for your cooperation in this matter. If you have any questions, call me at (609) 633-0713.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Doyon', with a long horizontal line extending to the right.

John Doyon, Case Manager  
Bureau of Case Management

cc. Mayor Edward Campbell, Borough of Gibbsboro  
Robert Lentine, Camden County Health Dept.  
Jim Kealy, NJDEP/BEERA  
Nancy Hamill, NJDEP/ETRA  
Joe Marchesani, NJDEP/BGWPA